

Pak & Whang LLC  
Byongchae Pak (BP-2387)  
Mitchell B. Nisonoff, of counsel (MN-1114)  
2011 Lemoine Avenue, Suite 205  
Fort Lee, NJ 07024  
(201) 461-3782

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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H.S.W. ENTERPRISES, INC.,

08 CIV 8476  
Judge Assigned: Sand (LBS)

Plaintiff,

-against-

WOO LAE OAK, INC., individually and  
d/b/a WOO LAE OAK SOHO and  
WOO LAE OAK BEVERLY HILLS,  
WOO LAE OAK 50 INC., individually  
and d/b/a BANN RESTAURANT, and  
YOUNG SOOK CHOI,

**NOTICE OF MOTION**

Defendants.

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**PLEASE TAKE NOTICE** that, upon the proposed Affidavit of Byongchae Pak, Esq., in Support of Motion to Withdraw as Counsel to Defendants, sworn to on March 1, 2010, together with the exhibits annexed thereto (the "Affidavit"), and Memorandum of Law submitted herewith, and all pleadings and proceedings heretofore had herein, Pak & Whang LLC ("P&W") will move this Court, before the Honorable Leonard B. Sand, the United States District Judge, at the United States Courthouse located at 500 Pearl Street, New York, New York, Courtroom 15-A, on **March 4, 2010, at 2:15 p.m., or as soon thereafter as counsel may be heard**, for an Order, pursuant to Local Civil Rule 1.4, granting permission for P&W to withdraw as counsel to

Defendants Woo Lae Oak, Inc., Woo Lae Oak 50 Inc. and Young Sook Choi (collectively, "Defendants") for Defendants' failure to pay P&W's legal bills and to file the proposed Affidavit under seal, allowing for the Court's *in camera* review and review by Defendants, but denying review of the contents by plaintiff, and denying plaintiff's pending motion for partial judgment on its second count, together with such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that answering affidavits and papers, if any, are to be served in accordance with Local Civil Rule 6.1.

Dated:           New York, New York  
                  March 1, 2010

**PAK & WHANG LLC**



By: Byongchae Pak (BP-2387)  
Attorneys for Defendants  
Woo Lae Oak, Inc., Woo Lae Oak  
50, Inc. and Young Sook Choi  
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16 West 32nd Street, Suite 705  
New York, NY 10001  
(By Appointment Only)

Of Counsel:  
Mitchell B. Nisonoff (MN-1114)

**CERTIFICATE OF SERVICE**

I certify that on March 1, 2010, I sent a copy of the Notice of Motion and Memorandum of Law electronically and by regular mail to:

Maria A. Savio, Esq.  
Richard S. Schurin, Esq.  
Gottlieb, Rackman & Reisman P.C.  
Attorneys for Plaintiff  
270 Madison Avenue  
New York, NY 10016

Dated: March 1, 2010



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Pak & Whang LLC  
Attorneys for Plaintiff  
By: Tae Hyun Whang, Esq.